

SITE: Florida Phosphate
BREAK: 10.1
OTHER: V.1

Mike Stephenson

02/21/2002 03:40 PM

To: Brad Jackson/R4/USEPA/US@EPA
cc: Mike Stephenson/R4/USEPA/US@EPA
Subject: Phosphate

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Brad,

In my opinion the Draft Phosphate Initiative Briefing Memo is withholdable as deliberative process and intra-agency communications. Despite the ability to withhold the document the inadvertent release of any document is a possibility. Clearly, the more widely dispersed a document is the more chance for an inadvertent disclosure. So, if the program chooses to send this Briefing Memo to EPA HQ, please be advised that despite the deliberative process nature of this briefing memo, sending it to EPA HQ adds an additional element of risk that an inadvertent disclosure might occur.

In any event, please be sure to adequately display on and in the briefing memo that it is an intra-agency deliberative process communication not subject to release under FOIA.

Thanks,

Mike



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